

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

-----X  
AHMED E. MOHAMED,

Plaintiff,

**Civil Action number :19-cv-**

vs.

**NOTICE OF REMOVAL**

HOLLY HAMLETT, CRST VAN EXPEDITED,  
INC. a/k/a CAST VAN EXPEDITED, INC. and  
JOHN DOE I-III,

Defendants.  
-----X

TO: Robert M. Kealy, Esq.  
AGRAPIDIS & MAROULES, P.C.  
777 Terrace Avenue, Suite 504  
Hasbrouck Heights, NJ 07604

**PLEASE TAKE NOTICE**, that on this date, defendants CRST Expedited, Inc. (improperly sued herein as CRST VAN EXPEDITED, INC. a/k/a CAST VAN EXPEDITED, INC.) and HOLLY HAMLETT by their undersigned counsel, have filed this Notice of Removal pursuant to 28 U.S.C. §1446(a), in the office of the Clerk of the United States District Court for the District of New Jersey.

1. Plaintiff AHMED E. MOHAMED brought a lawsuit against defendants HOLLY HAMLETT, CST VAN EXPEDITED, INC. a/k/a CAST VAN EXPEDITED, INC. by filing a Complaint and Jury Demand in the Superior Court of the State of New Jersey, Law Division, Hudson County on or about September 19, 2018 as a result of an alleged accident which occurred on or about October 5, 2016. A copy of the Complaint and Jury Demand is attached hereto as Ex A.

2. Plaintiff AHMED E. MOHAMED filed a First Amended Complaint and Jury Demand against defendants HOLLY HAMLETT, CRST VAN EXPEDITED, INC. a/k/a CAST VAN EXPEDITED, INC. in the Superior Court of the State of New Jersey, Law Division, Hudson County on or about January 8, 2019 as a result of the same alleged accident which occurred on or about October 5, 2016. A copy of the First Amended Complaint and Jury Demand is attached hereto as Ex B.

3. The Summons and First Amended Complaint were received by defendant CRST Expedited, Inc. on or about February 12, 2019. Summons attached as Ex. C.

4. The Summons and First Amended Complaint were received by defendant HOLLY HAMLETT on or about March 14, 2019.

5. There have been no other proceedings in this action.

6. According to the plaintiff's Complaint (Ex. A) and First Amended Complaint (Ex. B), the plaintiff purports to be a citizen and resident of the State of New Jersey, residing in Bayonne, Hudson County.

7. Defendant HOLLY HAMLETT is an Iowa resident, residing in Algona, Iowa.

8. Defendant CRST Expedited, Inc. is an Iowa corporation.

9. In the 4<sup>th</sup> paragraph of the First Count, 5<sup>th</sup> paragraph of the Second Count, 4<sup>th</sup> paragraph of the Sixth Count, 4<sup>th</sup> paragraph of the Seventh Count and 3<sup>rd</sup> paragraph of the Ninth Count of the plaintiff's First Amended Complaint, plaintiff AHMED E. MOHAMED alleged that, as a result of the subject accident, he was caused to suffer severe and permanent bodily injuries for which he has obtained medical treatment and which caused great pain and suffering, incapacitated him from pursuing his usual activities and created permanent disabilities that will in the future similarly incapacitate him, causing pain and suffering and will require medical attention. *Please see* Ex. B.

10. On February 15, 2019, the defendants served a request for a written Statement of Damages claimed on the plaintiff's counsel (Ex. D).

11. On March 6, 2019, the plaintiff's counsel served a response to the defendants' request for a written Statement of Damages claimed, indicating damages in the amount of \$1,000,000 (Ex. E).

12. Based upon the plaintiff's response to the defendants' request for a written Statement of Damages claimed and the language set forth in the plaintiff's First Amended Complaint, the matter in controversy exceeds \$75,000, exclusive of interest and costs.

13. Jurisdiction over the subject matter of this action is conferred on this Court by 28 U.S.C. §1441(a).

14. Jurisdiction in this Court is proper pursuant to 28 U.S.C. §1332 and 28 U.S.C. §1441 in that the parties are of complete diversity of citizenship, the amount in controversy exceeds

\$75,000 exclusive of interest and costs.

15. This Notice is filed with this Court within 30 days of defendants' receipt "through service or otherwise, of a copy of the initial pleading setting forth the claim for relief upon which such action or proceeding is based," as provided by 28 USC §1446(b).

**PLEASE TAKE FURTHER NOTICE**, that the defendants, upon filing the Notice of Removal in the office of the Clerk of the United States District Court for the District of New Jersey, have also filed copies of the Notice with the Clerk of the Superior Court of New Jersey, Law Division, Hudson County Courthouse, 595 Newark Ave, Jersey City, NJ 07306, to effect removal of this action to the United States District Court pursuant to 28 U.S.C. §1446(b).

Dated: March 27, 2019

LAW OFFICES OF LORNE M. REITER, LLC  
Attorneys for defendants  
CRST Expedited, Inc. and Holly Hamlett  
124 First Avenue  
Atlantic Highlands, New Jersey 07716  
732-747-9555

BY:

  
\_\_\_\_\_  
LORNE M. REITER

EX. A

Evans C. Agrapidis, Esq. - ID#036881983  
 AGRAPIDIS & MAROULES, P.C.  
 777 Terrace Avenue, Suite 504  
 Hasbrouck Heights, New Jersey 07604  
 (201)288-0500  
 ATTORNEYS FOR PLAINTIFF

Ahmed E. Mohamed,	:SUPERIOR COURT OF NEW JERSEY
	:LAW DIVISION: HUDSON COUNTY
	:
Plaintiff,	:DOCKET NO:
	:
V.	: CIVIL ACTION
	:
Holly Hamlett,	:
CST Van Expedited, Inc. A/K/A	:
Cast Van Expedited, Inc.	:
AND JOHN DOE I-III,	:
	:
Defendants.	:

### COMPLAINT AND JURY DEMAND

Plaintiff, Ahmed E. Mohamed, residing in the City of Bayonne, County of Hudson, in the State of New Jersey, by way of Complaint against the defendants, hereby alleges and says:

#### FIRST COUNT

1. At all times hereinafter mentioned, plaintiff, Ahmed E. Mohamed, was the owner and operator of a 2007 Chevy. Said vehicle was traveling south on Route 1&9 @ the intersection of Secaucus Road in the City of Jersey City, County of Hudson and in the State of New Jersey on or about October 5, 2016, at approximately 8:47 p.m.

2. At all times hereinafter mentioned, defendant, Holly Hamlett, presently residing in Algona, IA, was the operator of a 2010 Vanguard TL, with an attached trailer, owned by the defendant, CST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc., with a principal place of business located in Cedar Rapids, IA. Said vehicle was traveling on Secaucus Road @ the intersection of Route 1 & 9 South in the City of Jersey City, County of Hudson and in the State of New Jersey on or about October 5, 2016, at approximately 8:47 p.m. when defendant, while traveling down an entrance ramp for Route 1 & 9 South,

disobeyed the stop sign thereby striking plaintiff's vehicle.

3. John Doe I-III are unknown to plaintiff, who thereby brings suit against those defendants by fictitious name. At all times hereinafter mentioned, defendants John Doe I-III, are believed to be the owner or operator of the vehicle which is unknown to plaintiff. The full extent of those facts linking the fictitiously designated defendants with this cause of action is unknown to plaintiff at this time.

4. As a result of defendants' unlawful and negligent operation and control of their vehicles, plaintiff was caused to suffer serious injuries as defined in N.J.S.A. 39:6A-8, et seq., which has caused him great pain and suffering substantially interfering with his daily activities including medical expense.

5. These injuries necessitated him obtaining immediate and continuous medical treatment, caused him pain and suffering, interfered with his employment, and daily activities, and left him with recurring disabilities which will in the future cause additional pain and suffering necessitating future medical expense.

6. Additionally, plaintiff has suffered non-economic loss greater than the basic non-economic loss defined in the statute. The parties are covered persons as defined in N.J.S.A. 39:6A.

WHEREFORE, plaintiff, Ahmed E. Mohamed, demands Judgment against defendants, Holly Hamlett, CST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc and John Doe I-III, jointly and severally, for damages and pain and suffering and emotional distress, lost wages, and property damage, together with attorney's fees, interest, costs of suit and any other relief as the Court deems just and equitable.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
EVANS C. AGRAPIDIS, ESQ.

Dated: September 18, 2018

**DEMAND FOR TRIAL BY JURY**

Plaintiff hereby demands a trial by jury as to all issues raised in the Complaint.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
EVANS C. AGRAPIDIS, ESQ.

DATED: September 18, 2018

**DESIGNATION OF TRIAL COUNSEL**

Pursuant to R. 4:25-4, Robert M. Kealy, Esq. (ID#002441974), is hereby designated as Trial Counsel of this matter.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
EVANS C. AGRAPIDIS, ESQ.

DATED: September 18, 2018

**CERTIFICATION**

I certify that pursuant to R. 4:5-1, to my knowledge and based on the information available to me at this time, the matter in controversy is not the subject of any other action pending in any Court, or of a pending arbitration proceeding and that no additional parties are known at this time who should be added.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
EVANS C. AGRAPIDIS, ESQ.

DATED: September 18, 2018

**DEMAND FOR ANSWERS TO INTERROGATORIES**

Pursuant to Rule 4:17-1(b), the plaintiff hereby demands that the defendants provide answers to the uniform interrogatories set forth in Form C and C(1) of Appendix II of the Rules Governing the courts of the State of New Jersey.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
EVANS C. AGRAPIDIS, ESQ.

DATED: September 18, 2018



EX. B

1. Plaintiff, Ahmed E. Mohamed, resides in Bayonne, New Jersey.
2. Upon information and belief, at all times pertinent hereto, Defendant, CRST Van Expedited, Inc. A/K/A Cant Van Expedited, Inc, was a motor carrier involved in interstate commerce, as defined by the Federal Motor Carrier Safety Act, 49 C.F.R. §§350-399, with a principal place of business at 3930 16ave South West Cedar Rapids IA 52404 .
3. Upon information and belief, at all times pertinent hereto, Defendant, Holly Hamlett, resided in Algona IA.

4. Upon information and belief, at all times relevant herein Defendant, Holly Hamlett, acted within his scope of employment as employee, servant or agent of Defendant, CRST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc.

5. On or about October 5, 2016, Plaintiff, Ahmed E. Mohamed, operated his motor vehicle on Route 1&9 at the intersection of Secaucus Road in the City of Jersey City, County of Hudson and in the State of New Jersey.

6. At the aforementioned time and place, Defendant, Holly Hamlett, operated a tractor-trailer owned by Defendants, CRST Van Expedited Inc. A/K/A Cast Van Expedited, Inc.

7. At the aforementioned time and place, the vehicle operated by Defendant, Holly Hamlett, was traveling down an entrance ramp for Route 1&9 South, disobeyed the stop sign thereby striking plaintiff's vehicle.

### **FIRST COUNT**

#### **Negligence of Holly Hamlett**

1. Plaintiff repeats and realleges each and every allegation set forth above.

2. Defendant, Holly Hamlett, had a duty to operate her tractor-trailer in a safe and reasonable manner, to make proper observations, and take proper precautions to avoid striking Plaintiff, Ahmed E. Mohamed's, vehicle.

3. Defendant, Holly Hamlett, failed in the above-mentioned duties and was therefore negligent.

4. As a direct and proximate result of Defendant, Holly Hamlett's, negligence, Plaintiff, Ahmed E. Mohamed, suffered severe and permanent bodily injuries for which he has obtained medical treatment and which caused him great pain and suffering, incapacitated him from pursuing usual activities, and created permanent disabilities that will in the future similarly incapacitate him, cause him pain and suffering, and require medical attention.

**WHEREFORE, PLAINTIFF, Ahmed E. Mohamed, DEMANDS judgment against the Defendant, Holly Hamlett, herein for damages in an amount sufficient to compensate his injuries and any medical bills he has incurred, together with interest and costs of suit and other remedies.**

**SECOND COUNT**

**Statutory Violations of Holly Hamlett**

1. Plaintiff repeats and realleges each and every allegation set forth above.
2. Defendant, Holly Hamlett, violated state and federal statutes and regulations, including but not limited to N.J.A.C. §13:60, et seq. and 49 C.F.R. §§350-399.
3. Defendant, Holly Hamlett's statutory violations directly and proximately caused Plaintiff, Ahmed E. Mohamed's damages and injuries.
4. Defendant, Holly Hamlett, is negligent *per se* based on these statutory and regulatory violations.
5. As a direct and proximate result of Defendant, Holly Hamlett's, statutory violations, Plaintiff, Ahmed E. Mohamed, suffered severe and permanent bodily injuries for which he has obtained medical treatment and which caused him great pain and suffering, incapacitated him from pursuing usual activities, and created permanent disabilities that will in the future similarly incapacitate him, cause him pain and suffering, and require medical attention.

**WHEREFORE, PLAINTIFF, Ahmed E. Mohamed, DEMANDS judgment against the Defendant, Holly Hamlett, herein for damages in an amount sufficient to compensate his injuries and any medical bills he has incurred, together with interest and costs of suit and other remedies.**

**THIRD COUNT**

**Claim for Punitive Damages against Holly Hamlett**

1. Plaintiff repeats and realleges each and every allegation set forth above.
2. The acts and omissions aforesaid by Defendant, Holly Hamlett, constitute a wanton and willful disregard of the safety of members of the general public on and about the public roadways.

3. Plaintiff was a person who would foreseeable be harmed by such acts and omissions.

4. Plaintiff seeks damages pursuant to N.J.S.A. 2A:15-5.9, Punitive Damages Act.

**WHEREFORE**, PLAINTIFF, Ahmed Mohamed, DEMANDS judgment against the Defendant, Holly Hamlett, herein for punitive damages in an amount sufficient to compensate his injuries, together with interest and costs of suit and other remedies.

#### **FOURTH COUNT**

**Vicarious Liability of CRST Van Expedited, Inc. A/K/A Cant Van Expedited, Inc.**

1. Plaintiff repeats and realleges each and every allegation set forth above.

2. Defendant, CRST Van Expedited, Inc. A/K/A Cant Van Expedited, Inc, is vicariously liable for the acts and omissions of Defendant, Holly Hamlett.

**WHEREFORE**, PLAINTIFF, Ahmed E. Mohamed, DEMANDS judgment against the Defendant, CRST Van Expedited, Inc. A/K/A Cant Van Expedited, Inc, herein for damages in an amount sufficient to compensate his injuries and any medical bills he has incurred, together with interest and costs of suit and other remedies.

#### **FIFTH COUNT**

**Strict Liability of CRST Van Expedited, Inc A/K/A Cast Van Expedited, Inc.**

1. Plaintiff repeats and realleges each and every allegation set forth above.

2. Regardless of employment relationship, Defendant, CRST Van Expedite, Inc. A/K/A Cast Van Expedited, Inc. is the registered owner of the USDOT number 53773 displayed on the tractor unit involved in the aforementioned collision and is therefore responsible for the acts and omissions of the driver of that vehicle.

**WHEREFORE**, PLAINTIFF, Ahmed E. Mohamed, DEMANDS judgment against the Defendant, CRST Van Expedited, Inc. A/K/A Cast Expedited, Inc., herein for damages in an amount sufficient to compensate his injuries and any medical bills he has incurred, together with interest and costs of suit and other remedies.

**SIXTH COUNT**

**Negligence of CRST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc.**

1. Plaintiff repeats and realleges each and every allegation set forth above.
2. Defendant, CRST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc., had a duty to act reasonably in hiring and/or retaining Defendant, Holly Hamlett, and to promulgate and/or enforce rules and regulations to ensure its drivers and vehicles were reasonably safe.
3. Defendant, CRST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc., failed in the above-mentioned duties and was therefore negligent.
4. As a direct and proximate result of Defendant, CRST Expedited, Inc. A/K/A Cast Van Expedited, Inc.'s negligence, Plaintiff, Ahmed E. Mohamed, suffered severe and permanent bodily injuries for which he has obtained medical treatment and which caused him great pain and suffering, incapacitated him from pursuing usual activities, and created permanent disabilities that will in the future similarly incapacitate him, cause him pain and suffering, and require medical attention.

**WHEREFORE**, PLAINTIFF, Mohamed Ahmed, DEMANDS judgment against the Defendant, CRST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc. herein for damages in an amount sufficient to compensate his injuries and any medical bills he has incurred, together with interest and costs of suit and other remedies.

**SEVENTH COUNT**

**Statutory Violations of CRST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc.**

1. Plaintiff repeats and realleges each and every allegation set forth above.
2. Defendant, CRST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc. violated and encouraged Defendant, Holly Hamlett, to violate state and federal statutes and regulations, including but not limited to N.J.A.C. §13:60, et seq. and 49 C.F.R. §§350-399.
3. Defendant, CRST Van Expedited Inc., A/K/A Cast Van Expedited, Inc., is negligent *per se* based on these statutory and regulatory violations.

4. As a direct and proximate result of Defendant, CRST Van Expedited, Inc, A/K/A Cast Van Expedited, Inc.'s statutory violations, Plaintiff, Ahmed E. Mohamed, suffered severe and permanent bodily injuries for which he has obtained medical treatment and which caused him great pain and suffering, incapacitated him from pursuing usual activities, and created permanent disabilities that will in the future similarly incapacitate him, cause him pain and suffering, and require medical attention.

**WHEREFORE**, PLAINTIFF, Ahmed E. Mohamed DEMANDS judgment against the Defendants, CRST Van Expedited Inc. A/K/A Cast Van Expedited, herein for damages in an amount sufficient to compensate his injuries and any medical bills he has incurred, together with interest and costs of suit and other remedies.

**EIGHTH COUNT**

**Claim for Punitive Damages against CRST Van Expedited, Inc. A/K/A Cast Van Expedited, Inc.**

1. Plaintiff repeats and realleges each and every allegation set forth above.
2. The acts and omissions aforesaid by CRST Van Expedited Inc. A/K/A Cast Van Expedited constitute a wanton and willful disregard of the safety of members of the general public on and about the public roadways.
3. Plaintiff was a person who would foreseeable be harmed by such acts and omissions.

4. Plaintiff seeks damages pursuant to N.J.S.A. 2A:15-5.9, Punitive Damages Act.

**WHEREFORE**, PLAINTIFF, Ahmed E. Mohamed, DEMANDS judgment against the Defendant, CRST Van Expedited Inc. A/K/A Cast Van Expedited, herein for punitive damages, together with interest and costs of suit and other remedies.



**NINTH COUNT**  
**Fictitious Parties**

1. Plaintiff repeats and realleges each and every allegation set forth above.
2. Defendants, John Doe I-III and XYZ Corps. I-III, are fictitious names intended to represent additional persons or legal entities that have direct liability and/or vicarious liability for the injuries suffered by Plaintiff.
3. As a result of the acts and omissions of the Defendants, John Doe I-III and XYZ Corps. I-III, aforesaid, Plaintiff, Ahmed E, Mohamed, has suffered severe and permanent bodily injuries for which he has obtained medical treatment and which have caused him great pain and suffering, incapacitated him from pursuing usual activities and left him with permanent disabilities that will in the future similarly incapacitate him, cause him pain and suffering, and require medical attention.

WHEREFORE, PLAINTIFF, Ahmed E. Mohamed, demands judgment against DEFENDANTS, JOHN DOE I-III and XYZ CORPS. I-III, herein for damages in an amount sufficient to compensate him for his injuries together with interest.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
ROBERT M. KEALY, ESQ.

Dated: January 8, 2019



**DEMAND FOR TRIAL BY JURY**

Plaintiff hereby demands a trial by jury as to all issues raised in the Complaint.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
ROBERT M. KEALY, ESQ.

DATED: January 8, 2019

**DESIGNATION OF TRIAL COUNSEL**

\_\_\_\_ Pursuant to R. 4:25-4, Robert M. Kealy, Esq. (ID#002441974), is hereby designated as  
Trial Counsel of this matter.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
ROBERT M. KEALY, ESQ.

DATED: January 8, 2019

**CERTIFICATION**

I certify that pursuant to R.4:5-1, to my knowledge and based on the information  
available to me at this time, the matter in controversy is not the subject of any other action  
pending in any Court, or of a pending arbitration proceeding and that no additional parties are  
known at this time who should be added.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
ROBERT M. KEALY, ESQ.

DATED: January 8, 2019

**DEMAND FOR ANSWERS TO INTERROGATORIES**

Pursuant to Rule 4:17-1(b), the plaintiff hereby demands that the defendants provide answers to the uniform interrogatories set forth in Form C and C(1) of Appendix II of the Rules Governing the courts of the State of New Jersey.

AGRAPIDIS & MAROULES, P.C.  
Attorneys for Plaintiff

By:   
ROBERT M. KEALY, ESQ.

DATED: January 8, 2019

EX. C

AGRAPIDIS & MAROULES, P.C.  
 777 Terrace Avenue - Suite 504  
 Hasbrouck Heights, New Jersey 07604  
 (201) 288-0500  
 ATTORNEYS FOR PLAINTIFF

Ahmed E. Mohamed,	:SUPERIOR COURT OF NEW JERSEY
	:LAW DIVISION: HUDSON COUNTY
	:
Plaintiff,	:DOCKET NO: HUD-L-3719-18
	:
V.	: CIVIL ACTION
	:
Holly Hamlett,	:
CST Van Expedited, Inc. A/K/A	:
Cast Van Expedited, Inc.	:
AND JOHN DOE I-III,	:
	:
Defendants.	<b>SUMMONS</b>

**FROM THE STATE OF NEW JERSEY  
 TO THE DEFENDANT NAMED ABOVE:**

**CRST Van Expedited Incorporated A/K/A  
 Cast Van Expedited, Inc.**

*The plaintiff, named above, has filed a lawsuit against you in the Superior Court of New Jersey. The Complaint attached to this Summons states the basis for this lawsuit. If you dispute this Complaint, you or your attorney must file a written Answer or Motion and proof of service with the Deputy Clerk of the Superior Court in the county listed above within 35 days from the date you received this Summons, not counting the date you received it. (The address of each deputy clerk of the Superior Court is provided.) If the Complaint is one in foreclosure, then you must file your written Answer or Motion and proof of service with the Clerk of the Superior Court, Hughes Justice Complex, P.O. Box 971, Trenton, NJ 08625-0971. A filing fee payable to the Treasurer, State of New Jersey and a completed Case Information Statement (available from the deputy clerk of the Superior Court) must accompany your Answer or Motion when it is filed. You must also send a copy of your Answer or Motion to plaintiff's attorney whose name and address appear above, or to plaintiff, if no attorney is named above. A telephone call will not protect your rights; you must file and serve a written Answer or Motion (with fee of \$135.00 and completed Case Information Statement) if you want the court to hear your defense.*

*If you do not file and serve a written Answer or Motion within 35 days, the court may enter a judgment against you for the relief plaintiff demands, plus interest and costs of suit. If judgment is entered against you, the Sheriff may seize your money, wages or property to pay all or part of the judgment.*

*If you cannot afford an attorney, you may call the Legal Services office in the county where you live or the Legal Services of New Jersey Statewide Hotline at 1-888-LSNJ-LAW (1-888-576-5529). A list of these offices is provided. If you do not have an attorney and are not eligible for free legal assistance, you may obtain a referral to an attorney by calling one of the Lawyer Referral Services. A list of these numbers is also provided.*

Dated: July 10, 2014

Michelle M. Smith

Clerk, Superior Court of New Jersey

Name and Address of Defendant to be served: **CRST Van Expedited Incorporated A/K/A  
 Cast Van Expedited, Inc.  
 1332 Edgewood Rd SW,  
 Cedar Rapids. IA 52404**

EX. D

**LAW OFFICES OF LORNE M. REITER, LLC**

124 FIRST AVENUE  
ATLANTIC HIGHLANDS, NEW JERSEY 07716

TEL. (732) 747-9555  
FAX (732) 626-6800

LORNE M. REITER \*

LAURA C. JOHNSON +  
VANESSA L. KOPPEL ^  
KAREN K. HAHN ^  
SHARON B. MORELAND #

\* ADMITTED NEW YORK & NEW JERSEY  
+ ADMITTED NEW JERSEY & COLORADO  
^ ADMITTED NEW JERSEY  
# ADMITTED NEW YORK, NEW JERSEY &  
MASSACHUSETTS

NEW YORK OFFICE

14 WALL STREET, 20<sup>TH</sup> FLOOR  
NEW YORK, NY 10005  
(212) 222-0955  
(212) 202-4784 FAX

[lreiter@lreiterlaw.com](mailto:lreiter@lreiterlaw.com)

February 15, 2019

[r.kealy@amlawnj.com](mailto:r.kealy@amlawnj.com)

Robert M. Kealy, Esq.  
AGRAPIDIS & MAROULES, P.C.  
777 Terrace Avenue, Suite 504  
Hasbrouck Heights, NJ 07604

Re: Ahmed Mohamed v. Holly Hamlett, CRST, et als.  
Our File Number: 0026-0754-AMJ  
Date of Loss: October 5, 2016


Dear Mr. Kealy:

Our firm represents the defendants Holly Hamlet and CRST Van Expedited Incorporated with respect to the above-captioned matter.

We hereby demand that plaintiff serve upon us, within five (5) days from the date of service hereof, a written Statement of Damages claimed, pursuant to Rule 4:5-2.

Should you have any questions in this regard, please do not hesitate to contact the undersigned.

Very truly yours,

  
LORNE M. REITER

LMR:lms

EX. E

**LEANZA, AGRAPIDIS & MAROULES, P.C.**

A PROFESSIONAL CORPORATION

COUNSELORS AT LAW

777 TERRACE AVENUE, SUITE 504  
HASBROUCK HEIGHTS, NEW JERSEY 07604  
201-288-0500

FACSIMILE 201 288-0576  
WWW.LEANZALAW.COM

EVANS C. AGRAPIDIS  
JERRY MAROULES  
VINCENT A. GIORGIO  
CHRISTOPHER M. DESOCIO  
ROBERT M. KEALY  
NEIL R. MARION

OF COUNSEL  
FRANK M. LEANZA

ADDITIONAL OFFICES

521 FIFTH AVENUE, 17TH FLOOR  
NEW YORK, NEW YORK 10175  
212-406-3911

3232 KENNEDY BOULEVARD  
JERSEY CITY, NEW JERSEY 07306  
201-656-7828

March 6, 2019

Lorne M. Reiter, Esq.  
Law Offices of Lorne M. Reiter, LLC  
124 First Avenue  
Atlantic Highlands, New Jersey 07716

**RE: Ahmed Mohamed v. Holly Hamlett, CRST, et als.**  
**Docket No.: HUD-L-3719-18**  
**Date of Loss: October 5, 2016**

Dear Ms. Reiter,

In accordance to Rule 4:5-2 enclosed please find our Demand for Statement of Damages with regards to the above aforementioned matter.

It is my understanding that you will be representing Holly Hamlett and CRST Van Expedited. I will await your response.

Thank you.

Very truly yours,



ROBERT M. KEALY, ESQ.

RMK/tz



**Robert M. Kealy Attorney ID #002441974**  
**AGRAPIDIS & MAROULES, P.C.**  
**777 Terrace Avenue, Suite 504**  
**Hasbrouck Heights, New Jersey 07604**  
**(201) 288-0500 telephone**  
**(201) 288-0576 facsimile**  
**Attorney for Plaintiff(s)**

Ahmed E. Mohamed,	:	SUPERIOR COURT OF NEW JERSEY
	:	LAW DIVISION: HUDSON COUNTY
	:	
Plaintiff,	:	DOCKET NO: HUD-L-3719-18
	:	
V.	:	CIVIL ACTION
	:	
Holly Hamlett,	:	
CST Van Expedited, Inc. A/K/A	:	
Cast Van Expedited, Inc.	:	
AND JOHN DOE I-III,	:	
	:	
Defendants.	:	

---

**STATEMENT OF DAMAGES**

---

TO: Law Offices of Lorne M. Reiter, LLC  
Lorne M. Reiter, Esq.  
124 First Avenue  
Atlantic Highlands, New Jersey 07716  
Attorney for Defendants, **Holly Hamlett and CRST Van Expedited  
Incorporated**

Plaintiff seeks damages in the amount of ONE MILLION DOLLARS  
(\$1,000,000.00).

***AGRAPIDIS & MAROULES, P.C.***

By:

  
\_\_\_\_\_  
ROBERT M. KEALY, ESQ.

Dated:

**UNITED STATES DISTRICT COURT  
DISTRICT OF NEW JERSEY**

-----X  
AHMED E. MOHAMED,

Plaintiff,

CIVIL ACTION NO.:

vs.

**CERTIFICATION OF SERVICE**

HOLLY HAMLETT, CRST VAN EXPEDITED,  
INC. a/k/a CAST VAN EXPEDITED, INC. and  
JOHN DOE I-III,

Defendants.

-----X

LORNE M. REITER, ESQ. certifies as follows:

1. I am an attorney duly admitted to practice before this Honorable Court, and I hereby affirm the truth of the following statements under the penalty of perjury.

2. I am a member with the law firm of LAW OFFICES OF LORNE M. REITER, LLC, attorneys for the defendants CRST Expedited, Inc. (improperly sued herein as CRST VAN EXPEDITED, INC. a/k/a CAST VAN EXPEDITED, INC.) and HOLLY HAMLETT and, as such, I am fully familiar with the facts set forth herein.

3. On this date, I served copies of the within Notice of Removal upon the plaintiff in this action by mailing same via First Class Mail from 124 First Avenue, Atlantic Highlands, New Jersey 07716 addressed to the plaintiff's attorney, Robert M. Kealy, Esq., AGRAPIDIS & MAROULES, P.C., 777 Terrace Avenue, Suite 504, Hasbrouck Heights, NJ 07604.

4. Further, on this date, I caused a copy of the Notice of Removal to be filed with the Clerk of the Superior Court of New Jersey, Law Division, Hudson County, 595 Newark Ave., Jersey City, New Jersey 07306.

5. Pursuant to 28 U.S.C. §1746, I affirm under penalty of perjury that the foregoing is true and correct.

Dated: March 27, 2019

LAW OFFICES OF LORNE M. REITER, LLC  
Attorneys for defendants  
CRST Expedited, Inc. and Holly Hamlett  
124 First Avenue  
Atlantic Highlands, New Jersey 07716  
732-747-9555

BY:



LORNE M. REITER